

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:24-CV-21463-ALTMAN/SANCHEZ

NEREYDA SUHEY CASTILLO MARENCO,

Plaintiff,

vs.

J.C. PAINTING CONTRACTOR
LLC, MARIA GONZALEZ, AND
TOMAS GONZALEZ,

Defendants.

_____ /

NOTICE OF ACCEPTANCE
OF RULE 68 OFFER OF JUDGMENT – COUNT II

Plaintiff, Nereyda Suhey Castillo Morenco, notifies the Defendants, J.C. Painting Contractor LLC, Maria Gonzalez, and Tomas Gonzalez, that the Offer of Judgment served on her on July 11, 2024, under Fed. R. Civ. P. 68 is accepted:

Plaintiff agrees to accept the Defendants' offer to allow a judgment to be entered in her favor and against the Defendants, jointly and severally, for 1) one payment of \$5,000.00 to Plaintiff.

Plaintiff further agrees to accept the Defendants' offer that she be determined the prevailing party on Count II and entitled to recover her attorney's fees and costs from them, jointly and severally, under 26 U.S.C. §7434 in an amount to be negotiated by the Parties Parties or, if they cannot reach an agreement thereon, to be determined by the Court.

Plaintiff will hereafter notify the Clerk of Courts of the service of the Rule 68 Offer of Judgment as to Count II and this Notice of Acceptance to request the issuance of a judgment in her favor on Count II consistent with the above. *See* Fed. R. Civ. P. 68(a)(“ If, within 14 days after

being served, the opposing party serves written notice accepting the offer, either party may then file the offer and notice of acceptance, plus proof of service. The clerk must then enter judgment.”)

CERTIFICATE OF SERVICE

HEREBY CERTIFY that a true and correct copy of the foregoing was emailed on this 16th day of July 2024 to Todd W. Shulby, Esq., TODD W. SHULBY, P.A., as *Counsel for Defendants*, tshulby@shulbylaw.com, 1792 Bell Tower Ln, Weston, FL 33326.

s/Brian H. Pollock, Esq.
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